



NATIONAL RIGHT TO WORK LEGAL DEFENSE FOUNDATION, INC.
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May 13, 2005

Jeff S. Jordan
Supervisory Attorney
Complaints Examination &
Legal Administration
Federal Election Commission
Washington, D.C. 20463

RECEIVED
FEDERAL ELECTION
COMMISSION
OFFICE OF GENERAL
COUNSEL

2005 MAY 17 A 9:16

Re: *Gleason and Service Employees International Union, MUR 5612*

Dear Mr. Jordan:

You will find enclosed a Supplemental Affidavit of Stefan Gleason. Please consider this additional information as an amendment to Mr. Gleason's complaint.

Very truly yours,

Bruce N. Cameron

BNC/njr

enclosure

cc: Stefan Gleason

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**FEDERAL ELECTION COMMISSION
UNITED STATES OF AMERICA**

RECEIVED
FEDERAL ELECTION
COMMISSION
OFFICE OF GENERAL
COUNSEL

2005 MAY 17 A 9:17

Stefan Gleason,

Complainant,

and

Service Employees International Union,

Respondent.

MUR No. 5612

SUPPLEMENTAL AFFIDAVIT OF STEFAN GLEASON

I, Stefan Gleason, am competent to testify, have first-hand knowledge of the following matters, and after being duly sworn state as follows:

1. I filed the FEC complaint in this matter on November 10, 2004.
2. My complaint alleges (paragraph 5) that the Service Employees International Union (SEIU) used general treasury funds to support America Coming Together (ACT).
3. I would like to amend my complaint by adding information that just came to my attention today.
4. My office received an unsolicited mailing from a member of SEIU Local 32BJ. This mailing asked that my office help protect union members against the use of their dues money for politics. It appears to me that this union member is fearful of

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retaliation, because the mailing provided no information by which I could contact this union member.

5. This mailing included a copy of a fax from Stephanie Luongo, who I believe to be an SEIU policy analyst, which was addressed the payroll coordinators of local SEIU affiliates. This fax contains seven pages. Those seven pages are attached to this affidavit as Exhibit A.
6. In general, Exhibit A instructs local union payroll coordinators on how they should handle the payroll of SEIU local employees who worked on the 2004 presidential campaign. The fifth page (bottom) and sixth page of Exhibit A give instructions to locals who have members of their staff assigned to work for ACT during the campaign, but who do not have a separate political fund. Those locals must send, out of their general treasury funds (derived from ordinary dues), a payment to SEIU's IPEA (International Political Education Action Fund) to cover all of the salary, benefits and expenses of their staff assigned to ACT. The IPEA will then send this money back to the local and will be "reporting these contributions to and expenditures by IPEA." The locals are instructed to redeposit this money in their general treasury account.
7. I believe that these directions show, beyond any doubt, that SEIU employees working for ACT during the presidential campaign were paid out of ordinary union dues.

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Stefan Gleason
Stefan Gleason

Subscribed and sworn to before me
this 13th day of May, 2005.

Vignie A. Smith
Notary Public

My Commission expires: 12/31/08